

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JOHN HEBAL, JR. : CASE NO. 5-20-00284
Debtor : CHAPTER 13

JOHN HEBAL, JR. :
Movant, :

vs. :
PNC BANK, NATIONAL ASSOCIATION :

Respondents. :

OBJECTION TO CERTIFICATION OF DEFAULT

NOW COMES, John Hebal, Jr., the above Debtor, by and through his counsel, Tullio DeLuca, Esq., and files this Objection to Certification of Default and states the following:

1. Movant filed a Motion for Relief from the Automatic Stay due to a default in monthly payments.
2. On January 10, 2025, Movant filed a Certificate of Default stating that the Debtor has failed to cure the arrears.
3. Debtor's Counsel in attempting to contact the Debtor to ascertain if the payments were made and/or if Debtor is in possession of payments to cure the alleged default.
4. The Debtor requests that a hearing be scheduled on the Objection to the Certificate of Default.

WHEREFORE, the Debtor respectfully requests that this Honorable Court sustain the Objection to the Certification of Default and deny the granting of relief from the automatic stay.

Respectfully submitted,

Date: January 13, 2025

/s/Tullio DeLuca
Tullio DeLuca, Esquire

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 13, 2025, he caused a true and correct copy of Debtor's Objection to Certification of Default to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Brent Lemon, Esq. at blemon@kmlawgroup.com

Date of Mailing: January 13, 2025 /s/Tullio DeLuca
Tullio DeLuca, Esquire